

COMES NOW Third-Party Defendant Larry Wright (“Wright”) and Third-Party Plaintiffs DMA Properties, Inc. and Frank Daniel Moore (together, “Moore”) in agreement to move the Court to extend Wright’s response date to Moore’s Motion for Partial Summary Judgment filed on July 24, 2020, Doc. #28 in the adversary proceeding, as follows:

1. On August 5, 2020 Wright and Moore filed a stipulation regarding Wright’s answer deadline with the agreed service date being July 24, 2020 and an agreed answer date of August 14, 2020.

2. Pending before the Court, and prior to Wright’s appearance and answer date of August 14, 2020, Moore filed a Motion for Partial Summary Judgment seeking to construe language in the Pipeline Easement Agreement which is set for hearing on August 17, 2020.¹

3. Due to the stipulation on Wright’s answer date of August 14, 2020, the parties hereby move the Court to reset the MSJ hearing to a date in mid-September and extend Wright’s response to Moore’s Motion for Partial Summary Judgment to August 28, 2020.

WHEREFORE, PREMISES CONSIDERED, Wright and Moore pray the Court grant this Agreed Motion to extend Wright’s deadline to respond to Moore’s Motion for Partial Summary Judgment until August 28, 2020, and for the Court to move the hearing date from August 17, 2020 to a date in mid-September.

Respectfully submitted,

BAYNE, SNELL & KRAUSE
1250 N.E. Loop 410, Suite 725
San Antonio, Texas 78209
Telephone: (210) 824-3278
Facsimile: (210) 824-3937
Email: wgermany@bsklaw.com

¹ There are other matters currently set for final hearing August 17, 2020 that are not being re-set pursuant to this agreement.

By: /s/ William P. Germany
WILLIAM P. GERMANY
State Bar No. 24069777
Attorney for Third-Party Defendant Larry Wright

LANGLEY & BANACK, INC.
745 East Mulberry, Suite 700
San Antonio, Texas 78212
Telephone: (210) 736-6600
Facsimile: (210) 735-6889
Email: nwilson@langleybanack.com

By: /s/ Natalie F. Wilson
NATALIE F. WILSON
State Bar No. 24076779
*Counsel for Defendants/Third-Party Plaintiffs
DMA Properties, Inc. and Frank Daniel Moore*

Certificate of Service

I hereby certify that on August 10, 2020 a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States mail, first class, postage prepaid, at the address noted below.

<p>Charles John Muller, IV Email: john@muller-smeberg.com Muller Smeberg, PLLC 111 W. Sunset San Antonio, TX 78209</p> <p>Ronald J. Smeberg Email: ron@smeberg.com The Smeberg Law Firm, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926</p> <p>Counsel to Plaintiffs Krisjenn Ranch, LLC, Krisjenn Ranch, LLC, Series Uvalde Ranch, Krisjenn Ranch, LLC, Series Pipeline Row</p>	<p>Michael Black Email: mblack@burnsandblack.com BURNS & BLACK PLLC 750 Rittiman Road San Antonio, TX 78209</p> <p>Jeffery Duke Email: jduke@dbmmlaw.com DUKE BANISTER MILLER & MILLER 22310 Grand Corner Drive, Suite 110 Katy, TX 77494</p> <p>Counsel to Defendant Longbranch Energy, LP</p>
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<p>Ronald J. Smeberg Email: ron@smeberg.com The Smeberg Law Firm, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926</p> <p>Counsel to Third-Party Defendant Black Duck Properties, LLC</p>	<p>Shane P. Tobin Email: shane.p.tobin@usdoj.gov OFFICE OF THE U.S. TRUSTEE 903 San Jacinto Blvd, Room 230 Austin, Texas 78701</p> <p>United States Trustee</p>
<p>John Terrill 12712 Arrowhead Lane Oklahoma City, OK 73120</p> <p>Third Party Defendant, <i>pro se</i></p>	

/s/ William P. Germany
WILLIAM P. GERMANY